

Romaine C. Marshall (9654)
Jose A. Abarca (12762)
POLSINELLI PC
2825 East Cottonwood Parkway, Suite 500
Salt Lake City, UT 84121
Telephone: (801) 999-3504
rmarshall@polsinelli.com
jabarca@polsinelli.com

*Attorneys for Defendants iX Global LLC,
Joseph A. Martinez, and Travis Flaherty*

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, NORTHERN DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

DIGITAL LICENSING INC. (d/b/a “DEBT Box”), a Wyoming corporation; JASON R. ANDERSON, an individual; JACOB S. ANDERSON, an individual; SCHAD E. BRANNON, an individual; ROYDON B. NELSON, an individual; JAMES E. FRANKLIN, an individual; WESTERN OIL EXPLORATION COMPANY, INC., a Nevada corporation; RYAN BOWEN, an individual; IX GLOBAL, LLC, a Utah limited liability company; JOSEPH A. MARTINEZ, an individual; BENJAMIN F. DANIELS, an individual; MARK W. SCHULER, an individual; B & B INVESTMENT GROUP, LLC (d/b/a “CORE 1 CRYPTO”), a Utah limited liability company; TRAVIS A. FLAHERTY, an individual; ALTON O. PARKER, an individual; BW HOLDINGS, LLC (d/b/a the “FAIR PROJECT”), a Utah limited liability company; BRENDAN J. STANGIS, an individual; and MATTHEW D. FRITZSCHE, an individual,,

**STIPULATED MOTION FOR LEAVE
TO FILE UNDER SEAL ASSET
ACCOUNTINGS FOR DEFENDANTS IX
GLOBAL LLC, JOSEPH A. MARTINEZ,
AND TRAVIS FLAHERTY**

Case No.: 2:23-cv-00482

The Honorable Robert J. Shelby

<p>Defendant.</p> <p>ARCHER. DRILLING, LLC, a Wyoming limited liability company; BUSINESS FUNDING SOLUTIONS, LLC, a Utah limited liability company; BLOX LENDING, LLC, a Utah limited liability company; CALMFRTZ HOLDINGS, LLC, a Utah limited liability company; CALMES & CO, INC., a Utah corporation; FLAHERTY ENTERPRISES, LLC, an Arizona limited liability company; IX VENTURES FZCO, a United Arab Emirates company; PURDY OIL, LLC, a Nebraska limited liability company; THE GOLD COLLECTIVE LLC, a Utah limited liability company; and UIU HOLDINGS, LLC, a Delaware limited liability company,</p> <p>Relief Defendants.</p>	
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Pursuant to DUCivR 5-3(b)(2) and Federal Rule of Civil Procedure 5.2, the Securities and Exchange Commission (the “Commission”) and Defendants iX Global LLC, Joseph A. Martinez, and Travis Flaherty (“Defendants”) respectfully move the Court for leave for Defendants to file their asset accountings under seal.

On July 28, 2023, the Court ordered Defendants to prepare asset accountings to be filed with the Court and delivered to counsel for the Commission. On August 8, 2023, counsel for the Commission agreed and stipulated to Defendants filing and serving their asset accountings on August 18, 2023.

The parties file this stipulated motion seeking leave for Defendants to file their asset accountings under seal to protect their privacy.

For these reasons, the Commission and Defendants request that leave to file under seal be granted as set forth in the proposed order submitted concurrently herewith.

Dated: August 18, 2023.

Respectfully submitted,

SECURITIES AND EXCHANGE COMMISSION

/s/ Michael E. Welsh

Casey R. Fronk

Michael E. Welsh (electronically signed with
permission given via telephone on August 18, 2023)

Attorneys for the SEC

POLSINELLI PC

/s/ Jose A. Abarca

Jose A. Abarca

Romaine C. Marshall

*Attorneys for Defendants iX Global, LLC, Joseph A.
Martinez, and Travis A. Flaherty*

CERTIFICATE OF SERVICE

I hereby certify that on 18th day of August, 2023, the foregoing document was served via CM/ECF to all counsel of record.

/s/ Kaitlin Morgan